



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

2012 MAR -9 P 2:20

March 8, 2012

**SENSITIVE**

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia Carmona *PC*  
Chief Compliance Officer

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

BY: Jodi Winship/Sari Pickera *JP*  
Compliance Branch

SUBJECT: Reason To Believe Recommendation – 2011 Year-End Report for the  
Administrative Fine Program

Attached is a list of political committees and their treasurers who failed to file the 2011 Year-End Report in accordance with 2 U.S.C. 434(a). The Year-End Report was due on January 31, 2011.

The committees listed in the attached RTB Circulation Report either failed to file the report, filed the report no more than thirty (30) days after the due date (considered a late filed report), or filed the report more than thirty (30) days after the due date (considered a non-filed report). In accordance with the schedule of civil money penalties for reports at 11 C.F.R. 111.43, these committees should be assessed the civil money penalties highlighted on the attached circulation report.

**Recommendation**

1. Find reason to believe that the political committees and their treasurers listed on the RTB Circulation Report violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Report.
2. Send the appropriate letters.

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Federal Election Commission  
Reason to Believe Circulation Report  
2011 YEAR-END Not Election Sensitive 01/31/2012 H\_S\_P\_UNAUTH

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
2502	C00459412	AFGHANISTAN & IRAQ VETERANS FOR CONGRESS PAC		CHRISTOPHER COVUCCI	\$231,334	1		Not Filed	\$77,111 (est)	\$4,812
2503	C00258244	BUCK MCKEON FOR CONGRESS	MCKEON, HOWARD P. 'BUCK'	PATRICIA MCKEON	\$1,663,033	0	2/13/2012	13	\$365,700	\$4,600
2504	C00503938	FRIENDS OF TIM BURNS	BURNS, TIMOTHY R	GEORGE K. MCCLAUGHLIN	\$637,559	0	2/6/2012	6	\$637,559	\$4,500
2505	C00495549	JACKSON FOR VIRGINIA	JACKSON, EARL W SR	THEODORA J. JACKSON	\$166,756	0	2/8/2012	8	\$66,943	\$990
2506	C00500835	JIM GREENFIELD FOR CONGRESS	GREENFIELD, JIM	DAN HEGG	\$119,381	0	3/5/2012	Not Filed	\$89,033	\$3,850
2507	C00468199	SCHIFF FOR SENATE	SCHIFF, PETER DAVID	ANDREW SCHIFF	\$1,696,324	1		Not Filed	\$565,441 (est)	\$13,750

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
)  
Reason To Believe Recommendation - 2011 )  
Year-End Report for the Administrative )  
Fine Program: )  
AFGHANISTAN & IRAQ VETERANS ) AF# 2502  
FOR CONGRESS PAC, and COVUCCI, )  
CHRISTOPHER as treasurer; )  
BUCK MCKEON FOR CONGRESS, and ) AF# 2503  
MCKEON, PATRICIA as treasurer; )  
FRIENDS OF TIM BURNS, and GEORGE ) AF# 2504  
K MCLAUGHLIN as treasurer; )  
JACKSON FOR VIRGINIA, and ) AF# 2505  
THEODORA J JACKSON as treasurer; )  
JIM GREENFIELD FOR CONGRESS, and ) AF# 2506  
HEGG, DAN as treasurer; )  
SCHIFF FOR SENATE, and ANDREW ) AF# 2507  
SCHIFF as treasurer; )

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on March 13, 2012 the Commission took the following actions on the Reason To Believe Recommendation - 2011 Year-End Report for the Administrative Fine Program as recommended in the Reports Analysis Division's Memorandum dated March 08, 2012, on the following committees:

AF#2502 Decided by a vote of 6-0 to: (1) find reason to believe that AFGHANISTAN & IRAQ VETERANS FOR CONGRESS PAC, and COVUCCI, CHRISTOPHER as treasurer violated 2 U.S.C. 434(a) and make a preliminary

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determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2503 Decided by a vote of 6-0 to: (1) find reason to believe that BUCK MCKEON FOR CONGRESS, and MCKEON, PATRICIA as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2504 Decided by a vote of 6-0 to: (1) find reason to believe that FRIENDS OF TIM BURNS, and GEORGE K MCLAUGHLIN as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2505 Decided by a vote of 6-0 to: (1) find reason to believe that JACKSON FOR VIRGINIA, and THEODORA J JACKSON as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2506 Decided by a vote of 6-0 to: (1) find reason to believe that JIM GREENFIELD FOR CONGRESS, and HEGG, DAN as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2507 Decided by a vote of 6-0 to: (1) find reason to believe that SCHIFF FOR SENATE, and ANDREW SCHIFF as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

March 13, 2012  
Date

Shawn Woodhead Werth  
Shawn Woodhead Werth  
Secretary and Clerk of the Commission

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

March 15, 2012

Christopher Covucci, in official capacity as Treasurer  
Afghanistan & Iraq Veterans for Congress PAC  
105 Stony Brook  
Fishkill, NY 12524

C00459412  
AF#: 2502

Dear Mr. Covucci:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a Year End Report of Receipts and Disbursements every calendar year. This report, covering the period through December 31, 2011, was due no later than January 31, 2012. 2 U.S.C. § 434(a). Records at the Federal Election Commission ("FEC") indicate that this report was not filed within thirty (30) days of the due date. You should file this report if you have not already done so.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 2 U.S.C. § 434(a). 2 U.S.C. § 437g(a)(4). On March 13, 2012, the FEC found that there is reason to believe ("RTB") that Afghanistan & Iraq Veterans for Congress PAC and you, in your official capacity as treasurer, violated 2 U.S.C. § 434(a) by failing to file timely this report on or before January 31, 2012. Based on the FEC's schedules of civil money penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$4,812. Please see the attached copy of the Commission's administrative fine regulations at 11 CFR §§ 111.30-111.46. Attachment 1. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. See <http://www.fec.gov/af/af.shtml>. 11 CFR § 111.34. Your payment of \$4,812 is due within forty (40) days of the finding, or by April 22, 2012, and is based on these factors:

Sensitivity of Report: Not Election Sensitive  
Level of Activity: \$77,111  
Number of Days Late: Not Filed  
Number of Previous Civil Money Penalties Assessed: 1

At this juncture, the following courses of action are available to you:

**1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty**

If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response, including the AF# found at the top of page 1 under your committee's identification number, to the FEC's Office of Administrative Review, 999 E Street,

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NW, Washington, DC 20463. Your response must be received within forty (40) days of the Commission's RTB finding, or April 22, 2012. 11 CFR § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty, and must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. 11 CFR § 111.36(c).

The FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond your control. 11 CFR § 111.35(b). In order for a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. *Id.* Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to, (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 CFR § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to, (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 CFR § 111.35(d).

The "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. district court under 2 U.S.C. § 437g. 11 CFR § 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

## **2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge**

If you do not pay the calculated civil money penalty and do not submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that Afghanistan & Iraq Veterans for Congress PAC and you, in your official capacity as treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 *et seq.* The FEC may take any and all appropriate action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 CFR § 111.51(a)(2).

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**3. If You Choose to Pay the Civil Money Penalty**

If you should decide to pay the calculated civil money penalty, send the enclosed remittance form, along with your payment, to the FEC at the address on page 4. Upon receipt of your payment, the FEC will send you a final determination letter.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437g(a)(2). It will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 437g(a)(12)(A) until it is placed on the public record in accordance with 11 CFR § 111.42, unless you notify the FEC in writing that you wish the matter to be made public.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at <http://www.fec.gov/af/af.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact Sari Pickerall in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,



Caroline C. Hunter  
Chair

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**ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS**

In accordance with the schedule of penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at RTB is \$4,812 for the 2011 Year-End Report.

Please mail this remittance with a check or money order made payable to the Federal Election Commission to the following address:

Federal Election Commission  
P.O. Box 979058  
St. Louis, MO 63197-9000

If you choose to send your remittance and payment by courier or overnight delivery, please use this address:

U.S. Bank - Government Lockbox  
FEC #979058  
1005 Convention Plaza  
Attn: Government Lockbox, SL-MO-C2GL  
St. Louis, MO 63101

The remittance and your payment are due by April 22, 2012. Upon receipt of your remittance and payment, the FEC will send you a final determination letter.

**PAYMENTS BY PERSONAL CHECK**

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

**PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT**  
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FOR: Afghanistan & Iraq Veterans for Congress PAC

FEC ID#: C00459412

AF#: 2502

PAYMENT DUE DATE: April 22, 2012

PAYMENT AMOUNT DUE: \$4,812

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

2012 MAY -2 A 10: 06

May 1, 2012

MEMORANDUM

**SENSITIVE**

TO: The Commission

THROUGH: Alec Palmar *AP*  
Staff Director

FROM: Patricia Carmona *PC for PC*  
Chief Compliance Officer

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

BY: *JW* Jodi Winship/Sari Pickarall *JP*  
Compliance Branch

SUBJECT: Administrative Fine Program – Final Determination Recommendation for the  
2011 Year-End Report

Attached are two lists of political committees and their treasurers against which the Commission has found reason to believe (RTB) and assessed proposed civil money penalties calculated at RTB for failure to file or failure to timely file the 2011 Year-End Report. The first list represents the committees that have paid the civil money penalty and the second list represents the committees that have not paid the civil money penalty. The committees that have not paid have been given at least forty (40) days from the date of the Commission's RTB finding to remit payment.

In accordance with 11 CFR § 111.34 and 11 CFR § 111.40, the Commission shall send a final determination notice to those respondents that have either paid or not paid the civil money penalty.

For your information, two (2) committees disclosed a level of activity after the RTB finding which would result in a lowered civil money penalty. These two (2) committees will be assessed a civil money penalty at Final Determination (FD) that has been reduced since the RTB finding. An overview of each of these cases has been provided below.

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Jackson for Virginia (AF 2505) amended the 2011 Year-End Report after the RTB finding and disclosed a corrected level of activity which would result in a lowered civil money penalty. The committee disclosed total receipts and disbursements of \$42,174 (previously disclosed as \$66,943), thus the fine would be lowered from \$990 to \$360.

Schiff for Senate (AF 2506) filed the 2011 Year-End Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$938 (previously estimated to be \$565,441), thus the fine would be lowered from \$13,750 to \$312.

#### **RAD Recommendation**

- (1) Make final determination that the political committees and their treasurers listed on the attached reports violated 2 U.S.C. § 434(a) and assess the final civil money penalties so indicated.
- (2) Send the appropriate letters.

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Federal Election Commission  
FD Circulation Report Fine Not Paid  
2011 YEAR-END Not Election Sensitive 01/31/2012 H\_S\_P\_UNAUTH

AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Days Since RTB	FD Penalty
2502	AFGHANISTAN & IRAQ VETERANS FOR CONGRESS PAC		C00459412	CHRISTOPHER COVUCCI		Not Filed	\$77,111 (est)	1	03/13/2012	\$4,812	49	\$4,812
2505	JACKSON FOR VIRGINIA	JACKSON, EARL W SR	C00495549	THEODORA J. JACKSON	02/08/2012	8	\$42,174	0	03/13/2012	\$990	49	\$360
2507	SCHIFF FOR SENATE	SCHIFF, PETER DAVID	C00468199	ANDREW SCHIFF	03/28/2012	Not Filed	\$938	1	03/13/2012	\$13,750	49	\$312

Federal Election Commission  
FD Circulation Report Fine Paid  
2011 YEAR-END Not Election Sensitive 01/31/2012 H\_S\_P\_UNAUTH

AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Final Money Penalty	Date Paid	Amount Paid
2503	BUCK MCKEON FOR CONGRESS	MCKEON, HOWARD P. 'BUCK'	C00258244	PATRICIA MCKEON	02/13/2012	13	\$365,700	0	03/13/2012	\$4,600	\$4,600	04/16/2012	\$4,600
2504	FRIENDS OF TIM BURNS	BURNS, TIMOTHY R	C00303938	GEORGE K. MC LAUGHLIN	02/08/2012	6	\$637,559	0	03/13/2012	\$4,500	\$4,500	04/23/2012	\$4,500

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
)  
Administrative Fine Program - Final )  
Determination Recommendation for the )  
2011 Year End Report: )  
AFGHANISTAN & IRAQ VETERANS ) AF# 2502  
FOR CONGRESS PAC, and COVUCCI, )  
CHRISTOPHER as treasurer; )  
BUCK MCKEON FOR CONGRESS, and ) AF# 2503  
MCKEON, PATRICIA as treasurer; )  
FRIENDS OF TIM BURNS, and GEORGE ) AF# 2504  
K MCLAUGHLIN as treasurer; )  
JACKSON FOR VIRGINIA, and ) AF# 2505  
THEODORA J JACKSON as treasurer; )  
SCHIFF FOR SENATE, and ANDREW ) AF# 2507  
SCHIFF as treasurer; )

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on May 03, 2012 the Commission took the following actions on the Administrative Fine Program - Final Determination Recommendation for the 2011 Year End Report as recommended in the Reports Analysis Division's Memorandum dated May 01, 2012, on the following committees:

AF#2502 Decided by a vote of 6-0 to: (1) make a final determination that AFGHANISTAN & IRAQ VETERANS FOR CONGRESS PAC, and COVUCCI, CHRISTOPHER as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#2503 Decided by a vote of 6-0 to: (1) make a final determination that BUCK MCKEON FOR CONGRESS, and MCKEON, PATRICIA as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2504 Decided by a vote of 6-0 to: (1) make a final determination that FRIENDS OF TIM BURNS, and GEORGE K MCLAUGHLIN as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2505 Decided by a vote of 6-0 to: (1) make a final determination that JACKSON FOR VIRGINIA, and THEODORA J JACKSON as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2507 Decided by a vote of 6-0 to: (1) make a final determination that SCHIFF FOR SENATE, and ANDREW SCHIFF as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

May 3, 2012  
Date

Shawn Woodhead Werth  
Shawn Woodhead Werth  
Secretary and Clerk of the Commission

14092694561



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 4, 2012

Christopher Covucci, in official capacity as Treasurer  
Afghanistan & Iraq Veterans for Congress PAC  
105 Stony Brook  
Fishkill, NY 12524

C00459412  
AF#: 2502

Dear Mr. Covucci:

On March 13, 2012, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Afghanistan & Iraq Veterans for Congress PAC and its treasurer violated 2 U.S.C. § 434(a) for filing late or failing to file the 2011 Year-End Report. By letter dated March 15, 2012, the Commission sent notification of the RTB finding that included a civil money penalty calculated at the RTB stage of \$4,812 in accordance with the schedule of penalties at 11 CFR § 111.43. Within forty (40) days of the FEC's RTB finding, its treasurer was required to either transmit payment of the calculated civil money penalty or submit a written response challenging either the RTB finding or the calculated civil money penalty. You must also file the 2011 Year-End Report.

The FEC did not receive payment of the calculated civil money penalty or a written response within the time permitted. The FEC made a final determination on May 3, 2012 that you, in your official capacity as treasurer, and Afghanistan & Iraq Veterans for Congress PAC violated 2 U.S.C. § 434(a) and assessed a civil money penalty in the amount of \$4,812 in accordance with 11 CFR § 111.43. The civil money penalty is based on these factors:

Election Sensitivity of Report: Not Election Sensitive  
Level of Activity: \$77,111  
Number of Days Late: Not Filed  
Number of Previous Civil Money Penalties Assessed: 1

At this juncture, the following courses of action are available to you:

**1. If You Choose to Appeal the Final Determination and/or Civil Money Penalty.**

If you choose to appeal the final determination, you should submit a written petition, within thirty (30) days of receipt of this letter, to the district court of the United States for the district in which the committee or treasurer reside, or transact business, requesting that the final

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determination be modified or set aside. See 2 U.S.C. § 437g(a)(4)(C)(iii). Your failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver of the respondents' right to present such argument in a petition to the district court under 2 U.S.C. § 437g. 11 CFR § 111.38.

## **2. If You Choose Not to Pay the Civil Money Penalty and Not to Appeal**

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA") as amended by the Debt Collection Improvement Act of 1996 ("DCIA"), 31 U.S.C. § 3701 *et seq.* If you do not pay this debt within thirty (30) days (or file a written petition to a federal district court - see below), the Commission will transfer the debt to the U.S. Department of the Treasury ("Treasury") for collection. Within five (5) days of the transfer to Treasury, Treasury will contact the debtor and request payment. Treasury currently charges a fee of 28% of the civil money penalty amount for its collection services. The fee will be added to the amount of the civil money penalty that you owe. Should Treasury's attempts fail, Treasury will refer the debt to a private collection agency ("PCA"). If the debt remains unpaid, Treasury may recommend that the Commission refer the matter to the Department of Justice for litigation.

Actions which may be taken to enforce recovery of a delinquent debt by Treasury may also include: (1) offset of any payments, which the debtor is due, including tax refunds and salary; (2) referral of the debt to agency counsel for litigation; (3) reporting of the debt to a credit bureau; (4) administrative wage garnishment; and (5) reporting of the debt, if discharged, to the IRS as potential taxable income. In addition, under the provisions of DCIA and other statutes applicable to the FEC, the debtor may be subject to the assessment of other statutory interest, penalties, and administrative costs.

In accordance with the DCIA, at your request, the agency will offer you the opportunity to inspect and copy records relating to the debt, the opportunity for a review of the debt, and the opportunity to enter into a written repayment agreement.

## **3. If You Choose to Pay the Civil Money Penalty**

If you should decide to pay the civil money penalty, send the enclosed remittance form, along with your payment, to the address on page 4 within thirty (30) days of receipt of this letter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. The file will be made a part of the public record pursuant to 11 CFR § 111.42(b). Although the file must be placed on the public record within thirty (30) days from the date of the Commission's notification, this could occur at anytime following certification of the Commission's vote.

If you have any questions regarding the payment of the civil money penalty, please contact Sari Pickerall at Federal Election Commission, 999 E St., NW, Washington, DC 20463, or our toll free number (800) 424-9530 (at the prompt, press 5) or (202) 694-1130.

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On behalf of the Commission,

A handwritten signature in black ink, appearing to read "Caroline C. Hunter". The signature is fluid and cursive, with a long horizontal stroke at the end.

Caroline C. Hunter  
Chair

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**ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS**

In accordance with the schedule of penalties at 11 CFR § 111.43, the civil money penalty is \$4,812 for the 2011 Year-End Report.

This penalty should be paid by check or money order made payable to the Federal Election Commission. It should be sent by mail to:

Federal Election Commission  
PO Box 979058  
St. Louis, MO 63197-9000

If you choose to send your payment by courier or overnight delivery, please use this address:

U.S. Bank - Government Lockbox  
FEC #979058  
1005 Convention Plaza  
Attn: Government Lockbox, SL-MO-C2GL  
St. Louis, MO 63101

The form and payment are due within thirty (30) days of receipt of this letter.

**Payments by Personal Check**

Personal checks will be converted into electronic funds transfers (EFTs). Your account will be electronically debited for the amount on the check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

**PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT**

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FOR: Afghanistan & Iraq Veterans for Congress PAC

FEC ID#: C00459412

AF#: 2502

PAYMENT AMOUNT DUE: \$4,812

14092694563

FOR: Afghanistan & Iraq Veterans for Congress PAC

FEC ID#: C00459412

AF#: 2502

PAYMENT AMOUNT DUE: \$4,812

#360  
500.00

QUALITY IS OUR PRIORITY FOR LOCKBOX 9058  
SEQ# 002 \$ 0000050000 BA# 1 08-09-12 20 4



IRAQ VETERANS FOR CONGRESS  
POLITICAL ACTION COMMITTEE INC  
P O Box 1998  
White Plains, NY 10606

8/6/2012 360  
1-800-210

Pay to the Order of Federal Election Commission  
Five hundred ~~xx~~

HSBC  
Wappingers Falls, NY 12590  
AF# 2502

\$ 500  
Dollars

mi

QUALITY IS OUR PRIORITY FOR LOCKBOX 9058  
SEQ# 002 \$ 0000050000 BA# 1 08-29-12 20 3



IRAQ VETERANS FOR CONGRESS POLITI  
105 STONY BROOK RD  
FISHKILL NY 12524-2985

8-24 2012 1504  
50-7044/222  
915

PAY TO THE ORDER OF Federal Election Commission  
Five hundred

FIRST NIAGARA  
First Niagara Bank  
MEMO AF# 2502  
FEC ID# C00459412

\$ 500.00  
DOLLARS

mi

QUALITY IS OUR PRIORITY FOR LOCKBOX 9058  
SEQ# 003 \$ 0000050000 BU# 1 10-02-12 20 4



usbankcorp.  
The First National Bank

IRAQ VETERANS FOR CONGRESS POLITI  
105 STONY BROOK RD  
FISHKILL NY 12524-2985

9/28 12 1506  
50-7044/2223  
815

PAY TO THE  
ORDER OF Federal Election Commission \$ 500  
Five hundred no DOLLARS

FIRST NIAGARA  
First Niagara Bank  
MEMO A# File 2502  
FECID# C00459412

QUALITY IS OUR PRIORITY FOR LOCKBOX 9058  
SEQ# 002 \$ 0000050000 BA# 2 11-05-12 20 9



usbankcorp.  
The First National Bank

IRAQ VETERANS FOR CONGRESS  
POLITICAL ACTION COMMITTEE  
105 STONY BROOK RD  
FISHKILL, NY 12524-2985

10/20/12 1511  
50-7044/2223  
815

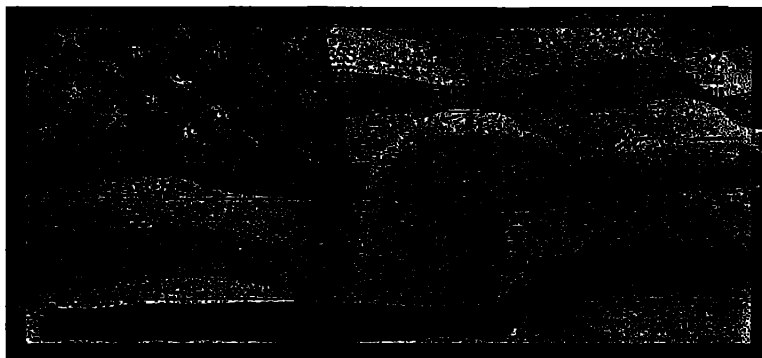
Pay to the  
Order of Federal Election Commission \$ 500.00  
Five hundred no Dollars

FIRST NIAGARA  
FECID# C00459412  
For A# 2502

FEDERAL ELECTION COMMISSION

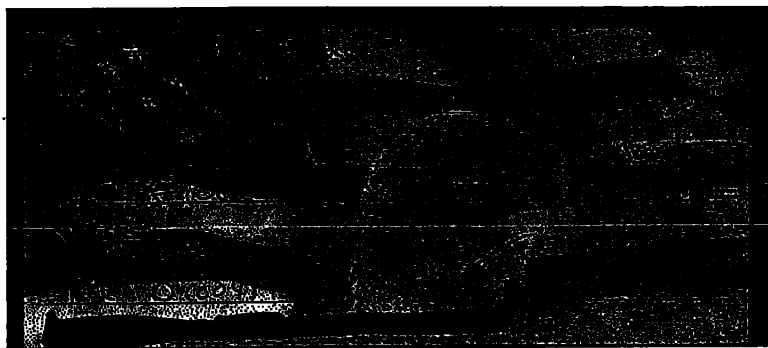
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usbank  
St. Louis GA Lockbox  
(314) 425-1818



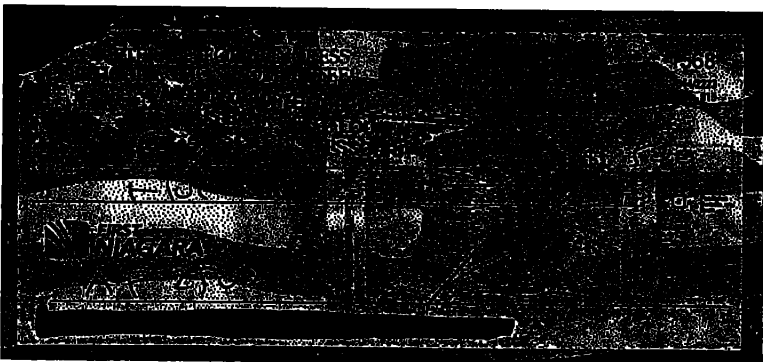
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1	1	Y-3002683	\$1,100.00	\$500.00

usbank

St. Louis GA Lockbox  
(314) 425-1818

Batch	Item	TID	Batch Total	Amount
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usbank 14092694568

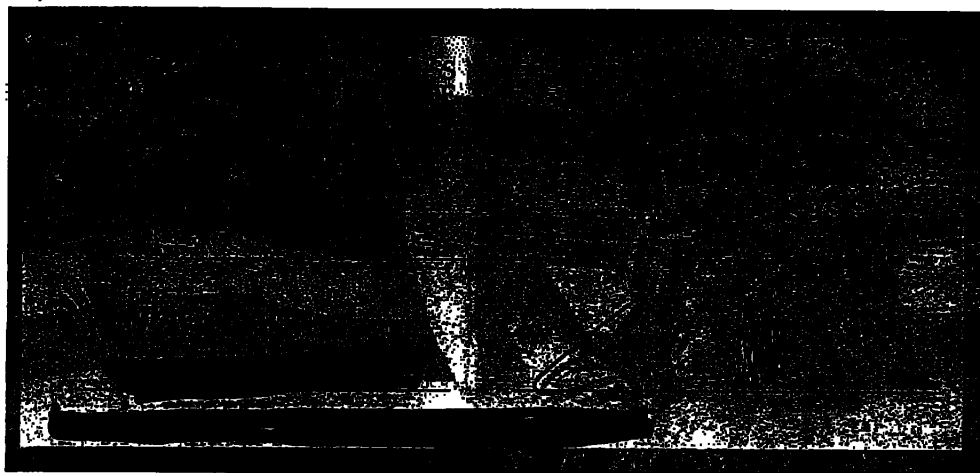
St. Louis GA Lockbox  
(314) 425-1818

Batch	Item	TID	Batch Total	Amount
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usbank

St. Louis GA Lockbox  
(314) 425-1818

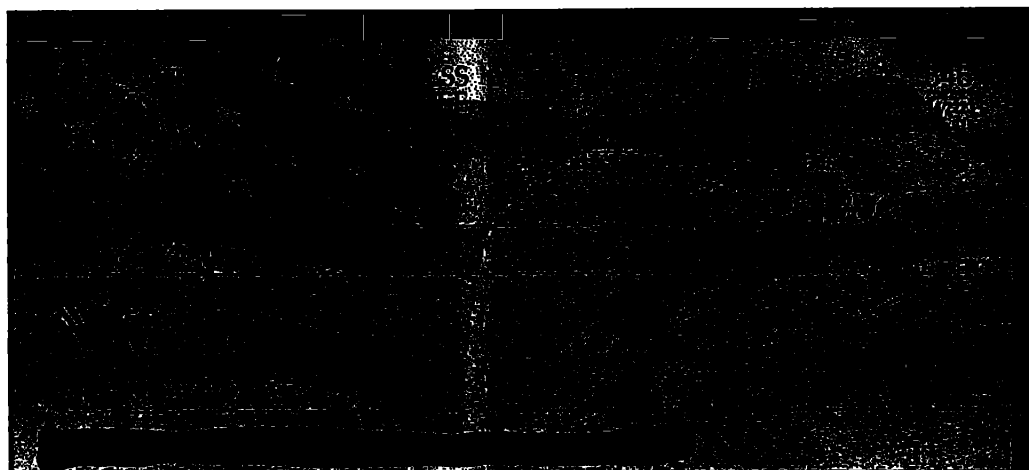
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1	1	Y-3022965	\$600.00	\$500.00

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(314) 425-1818

Batch	Item	TID	Batch Total	Amount
1	1	Y-3018759	\$770.00	\$500.00

FEDERAL ELECTION COMMISSION

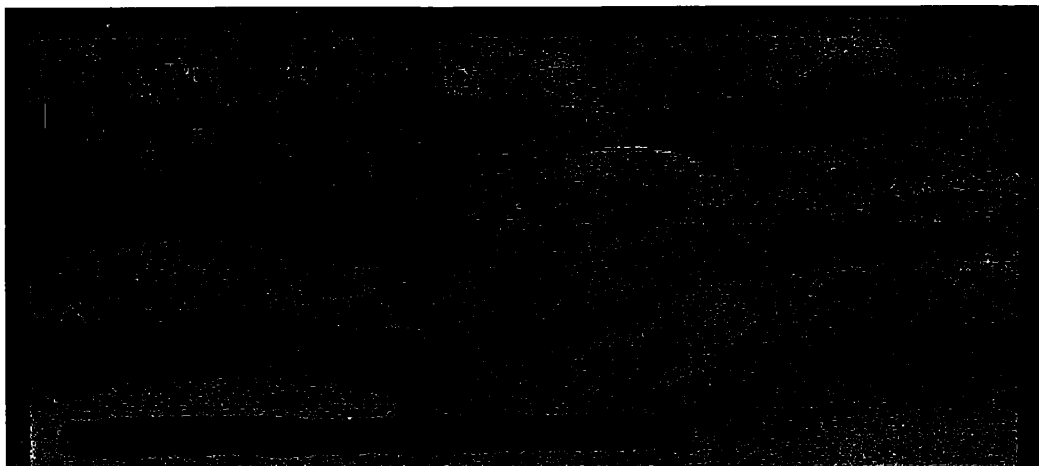
Lockbox: GLX-979058 Ledger Date 02/10/2014



Batch	Item	TID	Batch Total	Amount
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FEDERAL ELECTION COMMISSION

Lockbox: GLX-979058 Ledger Date 04/28/2014



Batch	Item	TID	Batch Total	Amount
1	1	Y-3103182	\$432.00	\$432.00

**usbank.**St. Louis GA Lockbox  
(314) 425-1818